IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

UNITED STATES OF AMERICA,)
PLAINTIFF,)
v.)) Case No.: 3:16-cv-00489-WHB-JC0
HINDS COUNTY at al)
HINDS COUNTY, et al.,)
DEFENDANTS.))

JOINT MOTION TO APPOINT ELIZABETH LISA SIMPSON AS MONITOR

Plaintiff, United States of America, and Defendants, Hinds County, et al., (collectively, "the Parties"), hereby jointly and respectfully request that this Court appoint Elizabeth Lisa Simpson as the Monitor in this case. Under the terms of the Settlement Agreement ("Agreement"), the Monitor will serve as a court appointed expert to ensure implementation of, and compliance with, the Agreement. *See* Settlement Agreement Par. 136 (Doc. 8-1). In support of this Motion, the parties submit a Memorandum of Law and attach a proposed Order (Exhibit 1).

Dated this 18th day of August, 2016.

Respectfully submitted,

COUNSEL FOR UNITED STATES OF AMERICA:

STEVEN H. ROSENBAUM Chief Special Litigation Section

MITZI DEASE PAIGE Civil Chief U. S. Attorney's Office Southern District of Mississippi LAURA L. COON Special Counsel Special Litigation Section

/s/ Christopher N. Cheng

CHRISTOPHER N. CHENG, PA Bar #69066
ELIZABETH C. KELLEY, VA Bar #80255
Trial Attorneys
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Ave., N.W.
Washington, DC 20530
Christopher.Cheng@usdoj.gov
(202) 514-8892
(202) 514-4883 (Fax)

COUNSEL FOR DEFENDANTS HINDS COUNTY; HINDS COUNTY BOARD OF SUPERVISORS; THE SHERIFF OF HINDS COUNTY IN HIS OFFICIAL CAPACITY:

/s/ Pieter Teeuwissen

PIETER TEEUWISSEN, MS Bar #8777
Board Attorney
P.O. Box 686
Jackson, MS 39205-0686
(601) 968-6797
(601) 968-6794 (fax)
pteeuwissen@co.hinds.ms.us

/s/ Claire Barker

CLAIRE BARKER, MS Bar #101312 Counsel to the Sheriff 407 East Pascagoula Street Jackson, MS 39205 (601) 974-2967 (601) 968-6705(Fax) cbarker@co.hinds.ms.us

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2016, I electronically filed the foregoing Joint Motion to Appoint Elizabeth Lisa Simpson as Monitor, with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

MITZI DEASE PAIGE Civil Chief

U. S. Attorney's Office

Southern District of Mississippi

STEVEN H. ROSENBAUM

Chief

Special Litigation Section

LAURA L. COON

Special Counsel

Special Litigation Section

CHRISTOPHER N. CHENG

Trial Attorney

Special Litigation Section

PIETER TEEUWISSEN

Board Attorney

CLAIRE BARKER

Counsel to the Sheriff

Dated this 18th day of August, 2016.

/s/ Elizabeth C. Kelley

ELIZABETH C. KELLEY, VA Bar #80255

Trial Attorney

U.S. Department of Justice

Civil Rights Division

Special Litigation Section

950 Pennsylvania Ave., N.W.

Washington, DC 20530

Beth.Kelley@usdoj.gov

(202) 514-0460

(202) 514-4883 (Fax)